

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

DEVANN DILLARD,)	
)	Case No. 6:22cv00031
Plaintiff,)	
)	
v.)	
)	
JARROD COX, et als.)	
)	
Defendants.)	

ANSWER OF JARROD COX

Defendant, Jarrod Cox, by counsel, responds to the allegations in the Amended Complaint as follows:

1. Paragraphs 1 through 4 of the Amended Complaint are statements of law to which no response is necessary. To the extent that a response is necessary, Defendant denies those allegations.
2. Defendant lacks sufficient knowledge to either admit or deny the truth of the allegations of paragraph 5 of the Amended Complaint.
3. Defendant admits the allegations of paragraphs 6 and 7 of the Amended Complaint.
4. Paragraphs 8-18 of the Amended Complaint do not pertain to this Defendant and do not require response by him.
5. Defendant lacks sufficient knowledge to admit or deny the allegations of paragraphs 19-26 of the Amended Complaint.
6. Defendant admits the allegations in paragraph 27 of the Amended Complaint.

7. Defendant lacks sufficient knowledge to admit or deny the allegations of paragraphs 28-38 of the Amended Complaint.

8. Defendant denies the allegations of paragraphs 39 of the Amended Complaint.

9. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraph 40 of the Amended Complaint.

10. Defendant denies the allegations of paragraphs 41-62 of the Amended Complaint.

11. Defendant lacks sufficient knowledge to admit or deny the allegations in paragraphs 63 and 64 of the Amended Complaint.

12. Defendant denies the allegations in paragraphs 65-96 of the Amended Complaint.

13. Defendant denies all allegations not expressly admitted herein.

14. Defendant denies that he is indebted or liable to the Plaintiff for the amounts and reasons set forth in the Amended Complaint or any other amounts or reasons whatsoever. Defendant is immune from liability of the allegations in the Amended Complaint in accordance with the Doctrines of Sovereign, Governmental and/or Qualified Immunity.

JARROD COX

By /s/ Jim H. Guynn, Jr.

Jim H. Guynn, Jr. (VSB # 22299)

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Attorney for Defendant Jarrod Cox

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of October, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

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